

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

Criminal No. 20-mj-30123

v.

JAYLEN MARCUS BROWN

Defendant.

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**MOTION AND BRIEF FOR LEAVE TO  
DISMISS COMPLAINT WITHOUT PREJUDICE**

Pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure, the United States of America hereby moves for leave to dismiss without prejudice the complaint against Jaylen Marcus Brown. Pursuant to Local Rule 7.1(a), counsel for defendant was contacted and DOES CONCUR in this motion.

In this case, the government needs additional time to develop and obtain evidence sufficient to establish defendant's guilt beyond a reasonable doubt. *See generally United States v. Lovasco*, 431 U.S. 783, 790-96 (1977); 18 U.S.C. § 3161(d)(1). The government's ability to prosecute this case properly would be substantially impaired were it required to proceed to indictment or information within the 30-day period prescribed by the Speedy Trial Act, *see* 18 U.S.C. §§

3161(b), 3161(h). Accordingly, the government requests leave to dismiss the complaint without prejudice.

Respectfully submitted,

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Dated: March 23, 2020

### **CERTIFICATE OF SERVICE**

I hereby certify that on March 23, 2020, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Sanford Plotkin

s/Andrew Picek  
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